

EXHIBIT 2

Memorandum of Activity

Case Number: I16A0120900	Office: Region 5 - Western (San Francisco)	Type of Activity: Interview
Date of Activity: 02/05/2024	Date Report Drafted: 02/09/2024	Location of Activity: 1901 Mission Street Santa Cruz CA
Subject of Activity: NORTH, BRAD	Activity Conducted By (Name(s)): Reggie Lee	Signature: R L

On February 5, 2024, Brad North (North), former skydiver, Parachute Center, was interviewed by Special Agents Reggie Lee and Richard Ficarelli, U.S. Department of Transportation, Office of Inspector General at Starbucks, 1901 Mission Street, Santa Cruz, CA. Also present were Assistant U.S. Attorneys Kate Lydon and Dhruv Sharma, U.S. Attorney's Office, Eastern District of California. In addition to the previous statements, North provided the following information:

North is an experienced skydiver with over 13,000 jumps. He first met Rob Pooley (Pooley) in 2011. Pooley was well known as a skilled and knowledgeable skydiver. Over the years, North built rapport with Pooley. In 2014, North took a Coach course offered by Pooley. The course was taught by "Chester" while Pooley debriefed North after each jump. The course was a one-day course consisting of 3-4 jumps. It costed \$150.

North worked as a cameraman skydiver photographing and videotaping first-time skydivers who were strapped to a Tandem Instructor. But his sales began to decline around the time GoPro was introduced. Tandem Instructors were able to strap a small camera on their wrist that captured photos and videos. As a result, North's sales began to decline. To supplement the lost income, North decided to seek a Tandem Instructor rating to boost his business. Tandem Instructors made \$45-50 per jump plus tips. Depending on the season, Tandem Instructors can do upwards of 20 jumps per day. There can be real economic value to becoming a tandem instructor, and it can be a career choice.

The U.S. Parachute Association (USPA) offered various instructional ratings for skydivers to teach. The first rating is the Coach rating which allowed skydivers to participate in training and present materials to students. A skydiver with a Coach rating may be paid by drop zones to train students. Coach rating is for solo jumps. The second rating is the instructor rating. Skydivers with Instructor ratings can correct skydivers during flight. Instructors are responsible for student's safety. The final rating is the Examiner rating, also the highest rating. An Examiner assesses candidates' understanding of training materials and evaluates their capabilities.

Tandem jumping was vastly different than solo skydiving. Tandem jumps used a different rig system than solo jumping and required the use of a drogue, which reduced speed. There were other factors to consider such as managing first-time skydivers, entanglements, etc. Tandem jumps accelerated much faster than solo skydiving due to the heavier mass and the drogue reduced the freefall speed until the canopy was deployed. North was intimidated by the difference in tandem jumps from solo skydiving and wanted to get his Tandem Instructor training from someone he knew who would provide honest feedback.

Parachute Center was known worldwide as an affordable drop zone and has a reputation of being the wild, wild west. Skydivers from around the world visited the Parachute Center for its cheap cost. A skydiver could increase their jump count by jumping from 2,000 feet jumps for \$5 each known as a "hop and pop." This was popular for foreign skydivers because it was expensive in their home country, and they could accumulate the number of jumps to record on their logbook. A skydive from a full altitude used to cost \$15 per jump. Prices at the Parachute Center have changed in the last 3-4 years.

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Pooley told North early on that he (Pooley) held an Instructor Examiner rating. North could not recall if Pooley advertised his classes, but it was widely known that Pooley taught classes. North had seen Pooley teach the course and had friends who had taken the course with him. Pooley never told North that his ratings had been suspended and was unqualified to teach. North took Pooley at his word and trusted him because of his initial and ongoing mentorship. North understood that you needed the expertise of an Instructor Examiner, as well as for the examiner to sign off on paperwork, in order to get a Tandem Instructor rating.

After registering for the Tandem Instructor training, Pooley provided links via text message to training manuals and told North to have his FAA third class medical certificate. North paid approximately \$1,100 for the class which included 10 slots on the aircraft and the tandem rig rental fee.

North arrived 10 minutes late on the first day of training with his FAA medical certificate and pre-requisite paperwork completed as per Pooley's instruction. The classes consisted of approximately 8 students, 2-3 who were Korean skydivers. One of the Korean skydivers was Yong Kwon. North could not recall the names of his classmates. North completed groundwork, demonstrating understanding of malfunctions, flow charts and emergency procedures, practiced strapping harnesses w/ experienced jumpers acting as students. The first jump was a solo skydive with the tandem rig. Then the next jumps were with experienced skydivers at the Parachute Center, who went by "Frosty" and "Irish." Frosty provided feedback to North. North was unsure if Frosty held an Instructor Examiner rating. North also jumped with Pooley at some point during the training. There were total of 6 jumps on the first day. After completing his first day of training, North recalled he spent the night at his friend's place in Roseville.

The second day of training started early. The students completed the remaining 4-5 jumps. North did not received feedback from Pooley as he was busy cycling through candidates. Instead, North was admonished by Bill Dause (Dause) for not flaring enough on his landing. North did not appreciate Dause's attitude and how he operated his business. North completed a written test which was graded on site. At the end of the day, Pooley provided USPA and UPT paperwork. North noticed Yuri Garmashov (Garmashov)'s signatures appeared to have been printed on the paperwork. North asked passively if Garmashov was supervising the course and Pooley said he was. North knew Garmashov in passing from Skydive Hollister but they were not friends. North did not see Garmashov at all during the course. After completing the paperwork, Pooley stated he would submit them for processing. North questioned the discrepancies but the training had been completed at this point. While Parachute Center was known as a cheap drop zone, it wasn't considered to be a fraudulent place. North thought it was weird that he did not get a copy of his paperwork.

North witnessed some of his classmates begin tandem skydiving with paying customers immediately after the course. North felt Pooley provided the absolute minimum training and felt some students required additional training.

After the course, North reached out to Pooley about when he could expect his USPA and UPT license but never received a response.

In hindsight, North felt he should have raised his concerns with the quality of Kwon's training with Pooley or USPA and UPT. North took Pooley at his word and felt betrayed by Pooley. North elected to take Pooley's training for honest feedback, not rubber stamping.

After Kwon's accident, North was offered to take retraining at Skydive California, but decided not to. North did not conduct tandem jumps after completing the course with Pooley. North was concerned with possible legal action against him for speaking out.

North asked Pooley for a refund but Pooley essentially said "get in line" because there were dozens of other

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North reviewed the following exhibits:

POOLEY_00003168 - North reached out to Pooley via Facebook on the status of his refund. He did not get a response.

POOLEY_00019503 - North confirmed he reviewed the USPA Instructional Rating Manual prior to the Tandem Instructor training course.

North reviewed blank copies to USPA and UPT Tandem Instructor application paperwork and confirmed that was the type of document he completed following training.

At the end of the interview, North was served with a trial subpoena.

Reviewed By (Initials): J S Date: 04/15/2024

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